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May 5, 2014

BY HAND DELIVERY AND ELECTRONIC MAIL

The Honorable Shira A. Scheindlin
United States District Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 1620
New York, New York 10007-1312

Re: Master File C.A. No. 1:00-1898 (SAS), M21-88, MDL No. 1358
Defendants' Pre-Conference Letter for May 13, 2014 Conference

Dear Judge Scheindlin:

Defendants respectfully submit this letter in advance of the May 13, 2014 conference.

DEFENDANTS' AGENDA ITEM

I. OCWD: Station Matrix

The parties have been working productively with each other since the last OCWD conference to draft a Case Management Order reflecting a workable station matrix that narrows the number of defendants targeted at each station and will enable many Defendants to prepare a more focused motion for summary judgment. Defendants will continue working with OCWD's counsel to try to resolve the matrix CMO. At the May 13 status conference, the parties may need the Court's assistance resolving open issues on the matrix CMO and/or related issues.

As always, we appreciate your Honor's attention this matter and ask that this letter be docketed by the Clerk's Office so that it is part of the Court's file.

The Honorable Shira A. Scheindlin

May 5, 2014

Page 2

Sincerely,

Peter John Sacripanti

Peter John Sacripanti

cc: All Counsel of Record by LNFS, Service on Plaintiffs' Liaison Counsel